Congress of the United States

Washington, DC 20515

February 14, 2003

Dr. Jeffrey W. Runge Administrator National Highway Traffic Safety Administration 400 7th Street, SW Washington, DC 20590

Dear Dr. Runge:

We are writing in response to the recent Notice of Proposed Rulemaking (NPRM) to increase corporate average fuel economy (CAFE) standards for light trucks by 1.5 miles per gallon by model year 2007. We believe that a much greater increase can and should be done to take advantage of the many existing technologies in automotive design that can increase fuel economy and reduce our nation's dangerous over-dependence on imported oil.

Fuel efficiency standards for light trucks have been too lax for far too long. As you know, when Congress enacted the Energy Policy and Conservation Act in 1975 it considered light trucks, a category that includes sport utility vehicles, minivans, and pickup trucks, differently than passenger cars because light trucks represented less than 10 percent of all vehicles sold and most were primarily used by construction contractors or for use on farms. Today, however, light trucks represent more than half of all vehicles sold, and, fitted with luxury features to rival top-of-the-line luxury sedans, few are ever driven off road. We believe the weak standards on fuel economy these vehicles enjoy are no longer justified.

That the technology exists to enable light trucks to achieve far greater fuel efficiency simply can no longer be doubted. The most recent comprehensive study of light trucks and fuel efficiency, issued in July of 2001 by the National Academy of Sciences, identified a set of 13 already-available technologies, each of which could be implemented immediately to achieve fuel economy improvements ranging from 0.5 to 12 percent.

We also believe that it is now unarguable that the fuel efficiency of light trucks can be improved without sacrificing safety. Again, according to the National Academy of Sciences report, fuel efficiency can be improved "without significantly affecting the safety of motor vehicle travel." And automakers themselves have recently boasted to the press of their intentions to introduce gas-electric hybrid technologies into the light truck market by 2005 that are capable of boosting fuel efficiency by up to 50 percent. Surely these companies do not plan to sacrifice the safety of their products for a few good headlines on better fuel economy.

The amount of gasoline Americans burn every day is equivalent to about eighty percent of the oil we import from foreign countries. We believe that figure should be

The Honorable Jeffrey W. Runge February 14, 2003

lower. Luckily the technology exists to allow it to become so. We urge you to promulgate a more significant increase in CAFE standards that reduces our dependence on foreign oil, increases our national energy security, and takes into account the advanced technologies that, at least in some cases, are already being applied.

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The Honorable Jeffrey W. Runge February 14, 2003	(7 /200s
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The Honorable Jeffrey W. Runge	
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